U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

MAY 2 1 1987

REPLY TO
ATTN OF HW-112

C. E. Clark
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

Re: Summary Assessment Reviews

Dear Mr. Clark:

We have reviewed the summary assessments for the following Solid Waste Management Units:

CPP-41 - Fire Training Pits
CPP-43 - Grease Pit
CPP-52 - Pickling Shed
CPP-70 - Septic Tank
CPP-71 - Seepage Pits
CPP-72 - Cesspool
CPP-75 - Leaching Cesspool
CPP-75 - Septic Tank
CPP-76 - Septic Tank
CPP-77 - Seepage Pit and Cesspool
ANL-W - Dry Wells by Building 759
ANL-W - Inter Building Coffin Neutralization Tank
ANL-W - Waste Retention Tank for Building 753
ANL-W - 768 Hot Well

The format used in the summary assessments provide a good mechanism for presenting the pertinent information about each Solid Waste Management Unit (SWMU). In reviewing the above assessments a number of recurring problems become apparent:

1. There is some confusion over what is being evaluated at each SWMU. The issue is not whether hazardous waste was disposed in a unit. Rather, the issue is whether hazardous constituents (see Appendix VIII listing at 40 CFR Part 261) have the potential for being released from the unit. In the discussion of the CPP-43 Grease Pit, the fact that oils and greases contain hazardous constituents was not discussed, for example.

2. Supporting information is not provided; although, a statement is made that each assessment includes a review of engineering plans, the facility master plan, and interviews. These statements are far too vague. Either a copy of the pertinent plan reviewed should be included or the plan number and applicable pages specifically referenced.

3. For each person interviewed, the name, work phone number and outline of what each person can attest to and the period of time covered must be included.

Without this information, the accuracy of each summary assessment cannot be reviewed and therefore no decision can be reached by EPA to delete a unit from the list.

Additional specific comments per SWMU follows:

CPP-41: The information provided supports the presence of hazardous constituents. The method used to manage these hazardous constituents included ground disposal. The assumption that the volatile wastes would evaporate is not supported. Therefore, a sampling plan will need to be developed for a simple shallow soil sampling program to determine if waste residues remain at the unit.

CPP-43: As stated above, oil and grease contain hazardous constituents and the information provided does not support that these constituents have been removed. If this unit is now capped by Building CPP-651, then it may be possible to support that the release potential is low. The support for this position is not contained in the summary assessment, however.

CPP-52: The only wastes identified are mineral acids, and soil neutralization is postulated for any wastes which may have been spilled. There is no discussion regarding the potential for hazardous constituents or for the leaching of metals from the soil due to acid spills. This summary needs expanding to properly assess the potential for hazardous constituent release. A simple shallow soil sampling program may also be advisable.

CPP-70: The basis for concluding that no hazardous constituents were released to the septic tank needs to be discussed. Also, have degreasers been used in the septic system in the past? Are septic wastes chlorinated? Again, the purpose of these assessments is to assess the potential for hazardous constituent release. Depending on the answers to these questions and the support references, this unit may be a good candidate for removal from the list.

CPP-71: See comments for CPP-70 as both received wastes from the same sources.

CPP-72: The cesspool is reported to have received waste from office trailers. Again depending on the supporting data this may be a good candidate for removal from the list.

CPP-73: This unit is reported to have received wastes from the T-5 lunchroom and is likely a good candidate for removal from the list.

CPP-74: More discussion is needed on the use of CPP-626 and the basis for the conclusion reached.

CPP-75: Depending upon the support data (i.e., the engineering drawing) showing that the sanitary system only received wastes from a single commode, this maybe a good candidate for removal from the list.

CPP-76: Since the conclusions reached for this septic tank unit are based on interviews, an evaluation of this assessment must await the inclusion of this information.

CPP-77: A maintenance fabrication shop would appear to be a good candidate for the presence of hazardous constituents. Either sampling or a better description of the operations which occurred in the shop is required before the conclusions asserted in the assessment can be supported.

ANL-W Dry Wells by Bldg. 759: This unit should be classified by a unique number for ease of processing. As stated above, the concern is for hazardous constituents not hazardous waste.

ANL-W Inter Bldg. Coffin Neutralization Tank: A unique number should be assigned. If information is available to support that the tank has not leaked or that spills have not occurred in the past, then the site may be a good candidate for removal from the list.

ANL-W Bldg 783 Waste Water Retention Tank: The summary information provided needs to be expanded and the basis for the conclusions given. What hazardous constituents may have been present needs to be evaluated. It appears that the unit is no longer present. However, this is not clear from the assessment.

ANL-W 768 Hot Well: There is no discussion of whether corrosion inhibitors or other hazardous constituents are present in the condensate. This information along with the support documentation references needs to be provided.

Please contact Wayne Peirre of my staff at (206) 442-7261 if you would like to discuss these comments.

Sincerely,

Kenneth D. Feigner, Chief
Waste Management Branch